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6 The Honorable Robert S. Lasnik
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

NO. 16-cv-1573-RSL

Plaintiff,

DECLARATION OF PAMELA BIERMAN

v.

HEIDI YOAST,

Defendant.

HEIDI YOAST,

Counterclaim-Plaintiff,

v.

JOB'S DAUGHTERS INTERNATIONAL,
SHELLY COLE aka SHELLY HOWRIGON,
an individual, ROD REID, an individual,

Counterclaim-Defendants.

Being duly sworn under her oath, Pamela Bierman states as follows:

1. My name is Pam Bierman. For close to forty (40) years I have been employed by and/or the owner of Doc Morgan Inc. I have owned Doc Morgan for the last eighteen (18) years. I am over the age of twenty-one (21) and under no legal disability.

2. I have personal knowledge of the facts set forth herein and if called to testify would state and allege the following.

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28 DECLARATION OF PAMELA BIERMAN
(16-cv-1573-RSL)

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

3. Since at least 1980, Doc Morgan has produced various jewelry, clothing, and other items bearing various JDI trademarks as a licensed vendor. Specifically, Doc Morgan has often utilized the "Job's Daughters" "IYOB FILIAE" and "JDI" marks on various clothing items, garment bags and other items we have produced and sold to JDI members. In addition, we will work with JDI members on specialty items and/or other requested items that utilize the JDI trademarks.

4. In addition, since at least 1980, Doc Morgan has produced and distributed catalogs showing various items we sell. Those items would include the JDI trademarks. In addition, since at least 2010, Doc Morgan has also advertised various items utilizing the JDI trademarks at www.docmorgan.com and then at www.jdistore.com.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and recollection.

DATED this 26th day of March at St. Charles, Illinois

Pam Bierman

DECLARATION OF PAMELA BIERMAN

Williams, Kastner & Gibbs PLLC
601 Union Street, Suite 4100
Seattle, Washington 98101-2380
(206) 628-6600

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2 CERTIFICATE OF SERVICE
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4 I hereby certify that on March 26, 2018, I electronically filed the foregoing with the Clerk
5 of the court using the CM/ECF system which will send notification of such filing to the
6 following:
7

8 Rodney L Umberger, Jr rumberger@williamskastner.com, ssanh@williamskastner.com
9

10 Daniel Velloth dvelloth@williamskastner.com, dlevitin@williamskastner.com,
11 mphilomeno@williamskastner.com

12 Brian T. McKernan bmckernan@mcmillan.com

13 Patricia I. Forman patriciaforman@gmail.com

14 Tracey v. Munger tracey@groveslawoffices.com

15 DATED this 26th day of March, 2018.

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s/ Rodney L. Umberger

s/ Daniel J. Velloth

Rodney L. Umberger, Jr., WSBA #24948

Daniel J. Velloth, WSBA #44379

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Job's Daughters International

DECLARATION OF PAMELA BIERMAN

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